



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

March 6, 2000

Mr. Michael Towle
On-Scene Coordinator
Hazardous Site Cleanup Division (3HS31)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

RE: 12th Street Landfill/Dump Site Document: Draft
Action Memorandum & Request for Sediment
Removal Support 12th Street Dump Site,
Wilmington, Delaware. March 2, 2000.

Dear Mr. Towle:

The Draft Action Memorandum identifies lead levels at concentrations as high as 264,000 mg/kg in site soils, 33,500 mg/kg in creek bank soils, and 19,500 mg/kg in sediment in Brandywine Creek. Considering that the concentrations of lead at the 12th street site are at least an order of magnitude greater than the ecological benchmarks used in EPA Region III and a dredge action occurred at the nearby DuPont Newport Superfund site in sediments with lead concentrations that were 700 mg/kg or greater, the Department of the Interior (Department) supports the proposed removal action (including sediment removal from Brandywine Creek). We recommend that the action be undertaken as soon as possible.

The Department appreciates the opportunity to comment on this issue. If you have any questions, please contact me at (215) 597-5378 or the U.S. Fish and Wildlife Service's Dan Murphy at (410) 573-4521. Thank you for your efforts to protect the environment.

Sincerely,

Michael T. Chezik
Regional Environmental Officer

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